

Exhibit B

Patrick Lyons

Subject: RE: SJMotion Sur-reply

From: "Locke, Thomas T" <TLocke@seyfarth.com>

Subject: Re: SJMotion Sur-reply

Date: June 25, 2020 at 2:04:27 PM EDT

To: Michelle Parfitt <MParfitt@ashcraftlaw.com>

Michelle,

It is PCPC's position that it did not present new issues in the reply. Plaintiffs have not explained what the alleged new issues were. Plaintiffs will need to explain those issues in their motion to file a sur-reply. So, plaintiffs should state now to PCPC what those issues are. If plaintiffs are unwilling to do so, PCPC can't consent to a sur-reply.

If plaintiffs file a motion to file a sur-reply, please include our entire email exchange with that motion.

Thanks,

Tom

Thomas T Locke | Partner | Seyfarth Shaw LLP
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tlocke@seyfarth.com | www.seyfarth.com

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On Jun 25, 2020, at 12:19 PM, Michelle Parfitt <MParfitt@ashcraftlaw.com> wrote:

[EXT. Sender]

Tom, Thank you and we appreciate your position. If it is your client's position that you are not consenting without a representation of what we expect to address in our response we will prepare the motion advising that the parties have met and conferred and cannot agree. Always happy to discuss if you believe I have overstated your client's position . Be well.

Michelle

Michelle A. Parfitt
Senior Partner

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From: "Locke, Thomas T" <TLocke@seyfarth.com>
Subject: Re: Sur Reply
Date: June 24, 2020 at 4:50:18 PM EDT
To: Michelle Parfitt <MParfitt@ashcraftlaw.com>

Michelle

We don't believe that we raised any new arguments. Please identify the arguments to which you are referring?

Tom

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On Jun 24, 2020, at 4:25 PM, Michelle Parfitt <MParfitt@ashcraftlaw.com> wrote:

[EXT. Sender]

Tom-

We intend a sur-reply of about 10-12 pages to address new arguments raised for the first time or made out of context by defendants in their reply brief to which Plaintiffs did not have an opportunity to respond to as not raised in defendant's opening brief.

As for your request for a sur-sur reply brief, we would consider your request once you receive our sur-reply brief. In that our sur-reply brief is in response to what you have already raised, we do not necessarily believe there should be a need for a sur-sur reply brief but will entertain your request.

Thank you for your consideration .

Regards,

Michelle

Michelle A. Parfitt
Senior Partner

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<image002.jpg>

On Jun 24, 2020, at 3:35 PM, Locke, Thomas T <TLocke@seyfarth.com<<mailto:TLocke@seyfarth.com>>>
wrote:

Michelle

What are the issues? What would the page length be? Would PCPC get a sur-reply to the sur-reply?

Tom

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On Jun 24, 2020, at 2:52 PM, Michelle Parfitt
<MParfitt@ashcraftlaw.com<<mailto:MParfitt@ashcraftlaw.com>>> wrote:

[EXT. Sender]

Tom, Good afternoon. I hope your week is going well.

I am writing to request PCPC's consent to Plaintiffs' motion to file a Sur-Reply to PCPC's Reply in Support of its Motion for Summary Judgment.

Thanking you in advance.
Michelle

Michelle A. Parfitt
Senior Partner

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